



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Ave., S.E.
Washington, DC 20590

NOV 15 2007

Mr. Michael W. Sullens B.S., D.PH.
Manager, OUHSC Nuclear Pharmacy
1110 N. Stonewall Ave., Rm. 139
Oklahoma City, OK 73117

Ref. No. 07-0135

Dear Mr. Sullens:

This responds to your letter regarding package marking requirements prescribed in § 178.3(a)(4) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

You state that, as a Nuclear Pharmacy, your question applies to liquid-filled syringes containing radioactive medical injections. The packages are capable of holding a maximum of 10 syringes, each syringe having a maximum capacity of 5 ml, and the maximum overall liquid capacity is 50 ml. Each syringe is encased in an individual lead-lined syringe holder, which the package is designed to hold. A fully loaded package weighs over 5 kg. You asked what size marking is required to be placed on the package described above.

Each specification or UN standard package must be marked in accordance with § 178.3(a)(4). The letters and numerals representing the markings must be at least 12.0 mm (0.47 inches) in height. For packages smaller than or equal to 30 L (7.9 gallons) capacity for liquids or 30 kg (66 pounds) for solids, the height must be at least 6.0 mm (0.2 inches). For packages having a capacity of 5 L (1 gallon) or 5 kg (11 pounds) or less, letters and numerals must be of an appropriate size. For a combination packaging, § 178.503 specifies marking the maximum gross mass in kilograms. If the gross mass is 5 kg or more, up to 30 kg, § 178.3 requires markings of at least 6.0 mm.

I hope this satisfies your inquiry. If we can be of further assistance, please contact us.

Sincerely,

John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards



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Engram
\$178.3 (a)(4)
Marking of Packaging:
07-0135

July 11, 2007

To: Hazardous Materials Information Center

Re: Formal Opinion request

To Whom It May Concern:

This letter is a written request for a Formal Opinion on the proper interpretation of the following section – found at Part 178.3 (a)(4), reproduced via scan below:

(4) Unless otherwise specified, letters and numerals must be at least 12.0 mm (0.47 inches) in height except that for packagings of less than or equal to 30 L (7.9 gallons) capacity for liquids or 30 kg (66 pounds) capacity for solids the height must be at least 6.0 mm (0.2 inches). For packagings having a capacity of 5 L (1 gallon) or 5 kg (11 pounds) or less, letters and numerals must be of an appropriate size.

We are a Nuclear Pharmacy, so our question applies to liquid-filled syringes containing radioactive medical injections. Our delivery packages (boxes) are capable of holding a max of 10 syringes, each syringe having a max capacity of 5ml – so the max overall liquid capacity is 50 ml. And each syringe is encased in an individual lead-lined syringe holder, which the package is designed to hold – again, 10 max. This means that the packaging itself, fully loaded, will weigh over the 5 kg limit, BUT this is only the packaging material – **there is no solid hazardous material, only the liquid in the syringes** – and this is obviously way below the 5 L limit.

So the actual question is:

Do we have to use the minimum of 6.0 mm lettering on our package because we fail the weight limit? Again, the vast majority of the weight attributable to packing materials alone.

- OR -

Do we only have to use letters and numerals “of an appropriate size” since the only hazardous material in the “package” is the liquid in the syringes, and at a max of 50 ml, we are well under the liquid capacity limit of 5 L?

Sincerely,

Michael W. Sullens B.S., D.Ph.

Manager, OUHSC Nuclear Pharmacy